

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

AMY EVERETT and TJELVAR EVERETT	*	
	*	
Plaintiffs,	*	
v.	*	CIVIL ACTION
	*	NO. 1:17-CV-3392-TWT
COBB COUNTY, GEORGIA; OFFICER	*	
JAMES W. HOPKINS, in his individual	*	
Capacities; and LANI MESHELLA	*	
MILLER, in her individual capacity;	*	
	*	
Defendants.	*	
	*	

COUNTY DEFENDANTS' SUPPLEMENT TO INITIAL DISCLOSURES

COMES NOW, Defendants Cobb County, and Officer James W. Hopkins (hereinafter "County Defendants") and, pursuant to Fed. R. Civ.P. 26(a) and L.R. 26.1(B), NDGa, make the following Supplement To Initial Disclosures. These disclosures are based upon and therefore limited by records and information in existence, presently recollected and thus far discovered in the course of preparing these disclosures. Therefore, County Defendants reserve the right to make changes in these disclosures if it appears that at any time inadvertent errors or omissions have been made or additional or more accurate information has become available.

DISCLOSURE 5

Provide the name and, if known, the address, telephone number of each individual likely to have discoverable information that you may use to support your claims or defenses, unless solely for impeachment, identifying the subjects of the information. (Attach witness list to Initial Disclosures as Attachment A).

RESPONSE TO DISCLOSURE 5

See Supplement to Attachment A. In addition to witnesses previously listed, these witnesses may have information related to the County Defendants' defenses. County Defendants may add other persons after full investigation and discovery. County Defendants incorporate those names Plaintiffs identify in their Initial Disclosures.

CERTIFICATE OF TYPE STYLE

This document was prepared using Times New Roman 14 Point font.

This 30th day of August, 2018.

[Signature on Following Page]

COBB COUNTY ATTORNEY'S OFFICE
Attorney for County Defendants

By: /s/Eddie Snelling, Jr.

EDDIE SNELLING, JR.

Sr. Associate County Attorney

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	*	

CERTIFICATE OF SERVICE

It is hereby certified that I have this day electronically filed with the Clerk and served a true and correct copy of County Defendants' Supplement To Initial Disclosures by using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorney of record:

John Paul Batson
1104 Milledge Rd.
Augusta, GA 30914

Richard N. Blevins, Jr.
191 Roswell Street
Marietta, GA 30060

[Date and Signature on Following Page]

This 30th day of August, 2018.

COBB COUNTY ATTORNEY'S OFFICE
Attorneys for County Defendants

By: /s/Eddie Snelling, Jr.
EDDIE SNELLING, JR.
Senior Associate County Attorney
State Bar No. 665725

100 Cherokee Street, Suite 350
Marietta, GA 30090
770-528-4000 (Phone)
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SUPPLEMENT TO ATTACHMENT A

List of witnesses presently known to County Defendants that may be used in support of their defenses:

10. Brian Batterton, CCPD, may have information about Department training; 140 North Marietta Parkway, Marietta, Ga 30060, 770 499-3900;
11. C.T. Cox (Ronnie Prince, previously listed, is now retired) CCPD, may have information about Department policy; 140 North Marietta Parkway, Marietta, Ga 30060, 770 499-3900;
12. Jimmy Newkirk, Assistant Solicitor, or associate may have information related to the basis for nolle prosequi of criminal charges; 10 East Park Square, Ste. 500, Marietta, GA 30090, 770-528-8500.
13. All individuals, officers and officials listed by Plaintiff or deposed by Plaintiff for this proceeding.

Other officials not yet identified may be added as witnesses based upon additional investigation, receipt of additional records or other documents and clarification of Plaintiffs' claims.